## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

CHECKSUM VENTURES, LLC,

Plaintiff,

Case No. 1:18-cv-6321

v.

Hon. Robert Michael Dow Jr.

**DELL INC.**,

Jury Trial Demanded

Defendant.

## JOINT MOTION TO CONTINUE STATUS HEARING

Plaintiff CheckSum Ventures, LLC and Defendant Dell Inc. respectfully request that the Court continue until 9:00 a.m. on January 17, 2019 the initial status conference currently set for December 18, 2018. The parties have not yet submitted a joint status report, nor met and conferred regarding the same. Further, Defendant has not yet retained local counsel who could appear on its behalf. The reason the parties ask to continue the status hearing is to allow them time to perform such tasks before the hearing. Thus, the parties respectfully request that the Court grant this motion.

Dated: December 17, 2018

/s/ Isaac Rabicoff

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Counsel for Plaintiff CheckSum Ventures, LLC /s/ Neil J. McNabnay

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Counsel for Defendant Dell Inc.

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on December 17, 2018, to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system.

/s/ Kenneth Matuszewski
Counsel for Plaintiff